

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
SOUTHERN DIVISION**

**AUTO-OWNERS INSURANCE)
COMPANY, a mutual insurance company)
incorporated in the State of Michigan,)
)
Plaintiff,)
) **Civil Action No: 1:05-cv-1024-MHT**
v.)
)
SUNSHINE CAMPING CENTER, INC.,)
et al.)**

Defendants.

REGIONS BANK'S INITIAL DISCLOSURES

Defendant Regions Bank (“Regions”) makes the following initial disclosures pursuant to *Fed. R. Civ. P. 26(a)(1)*:

REQUIREMENT (A): The name and, if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless solely for impeachment, identifying the subjects of the information.

DISCLOSURE:

The following individuals may have knowledge of information used to support Regions defenses:

1. W. Comer Borland, III – 2377 Joe Bruer Road, Daleville, Alabama 36322; Mr. Borland, an officer and employee of Sunshine Camping Center, Inc., possesses discoverable information relating to the underlying action pending in the Circuit Court of Dale County, Alabama bearing Civil Action No. CV-04-251-M (the “underlying action”).

2. Jon K. Williams – 658 South County Road 9, Slocomb, Alabama, 36375; Mr. Williams, a former officer and employee of Sunshine Camping Center, Inc., possesses discoverable information relating to the underlying action.

3. Robert M. McAllister – 850 Hilltop Road, Newton, Alabama, 36352; Mr. McAllister possesses discoverable information relating to the underlying action.

4. Dorothy Peters – 665 Peters Road, Slocomb, Alabama, 36375; Mrs. Peters possesses discoverable information relating to the underlying action.

5. Hubert Lawson – 1006 N. Hazelwood Drive, Geneva, Alabama, 36340; Mr. Lawson possesses discoverable information relating to the underlying action.

6. Agent J.R. Ward – Alabama Bureau of Investigation, 301 South Ripley Street, Montgomery, Alabama, 36104; Agent Ward, an agent of the Alabama Bureau of Investigation, possesses discoverable information relating to the underlying action.

7. Dale York – c/o Balch & Bingham LLP, 105 Tallapoosa Street, Suite 200, Montgomery, Alabama, 36104; Mr. York, an employee of Regions, possesses discoverable information relating to the underlying action.

8. Mel Channel – c/o Balch & Bingham LLP, 105 Tallapoosa Street, Suite 200, Montgomery, Alabama, 36104; Mr. Channel, an employee of Regions, possesses discoverable information relating to the underlying action.

9. A corporate or other representative of Community Bank & Trust of Southeast Alabama – 901 North Bollweevil Circle, Enterprise, Alabama 36330; a corporate or other representative of Community Bank & Trust of Southeast Alabama possesses discoverable information relating to the underlying action.

10. A corporate or other representative of Commercial Bank of Ozark – 208 S. Mennick Avenue, Ozark, Alabama, 36360; a corporate or other representative of Commercial Bank of Ozark possesses discoverable information relating to the underlying action.

11. Mary M. Bludsworth or other representative of the Clerk of the Circuit Court of Dale County, Alabama – Mrs. Bludsworth or other representative of the Clerk of the Circuit Court of Dale County, Alabama possesses discoverable information relating to the underlying action.

12. James M. Counts or other representative of the Clerk of the Circuit Court of Coffee County, Alabama – Mr. Counts or other representative of the Clerk of the Circuit Court of Dale County, Alabama possesses discoverable information relating to the underlying action.

REQUIREMENT (B): A copy of, or a description by category and location of, all documents, data compilations, and tangible things in the possession, custody, or control of the party and that the disclosing party may use to support its claims or defenses, unless solely for impeachment.

DISCLOSURE:

- (a). The Auto-Owners Insurance Company policies of insurance at issue.
- (b). The complaint, as amended, and all other pleadings filed in the underlying action.
- (c). All documents produced during the discovery process associated with the underlying action pending in the Circuit Court of Dale County, Alabama.
- (d). Documents in the possession of Agent J.R. Ward of the Alabama Bureau of Investigation.
- (e). All Exhibits which may be used at the trial of the underlying action.

Because Regions is in the initial stages of discovery, it reserves the right to supplement and/or amend these disclosures as necessary.

REQUIREMENT (C): A computation of any category of damages claim by the disclosing party, making available for inspection and copying as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered.

DISCLOSURE:

Not applicable.

REQUIREMENT (D): For inspection and copying as under Rule 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment.

DISCLOSURE:

Not applicable.

Respectfully submitted this the 14th day of March, 2006.

s/ G. Lane Knight
One of the Attorneys for Regions Bank

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CERTIFICATE OF SERVICE

I certify that on March 14, 2006, the foregoing was electronically filed with the Clerk of the Court of the Middle District of Alabama using the CM/ECF system which will send notification of such filing and/or that a copy of the foregoing has been served by United States Mail, properly addressed and postage prepaid to the following:

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